

Exhibit A

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SCANSOFT, INC.,

Plaintiff,

V.

C.A. No. 04-10353-PBS

VOICE SIGNAL TECHNOLOGIES, INC.,
LAURENCE S. GILLICK, ROBERT S.
ROTH, JONATHAN P. YAMRON, and
MANFRED G. GRABHERR,

Defendants.

DECLARATION OF WENDY S. PLOTKIN

Wendy S. Plotkin deposes and states as follows:

1. I am an attorney in the law firm of Choate, Hall & Stewart, and a member of the bar of the Supreme Judicial Court of the Commonwealth of Massachusetts and the United States District Court for the District of Massachusetts. I am counsel to the above-named defendants and make this declaration in support of the defendants' Motion for Sanctions for Failure to Comply with Discovery Order.

2. Attached hereto as Ex. 1 is a true and correct copy of ScanSoft, Inc.'s Responses to First Set of Interrogatories of Voice Signal Technologies, Inc.

3. Attached hereto as Ex. 2 is a true and correct copy of Defendant's First Set of Document Requests to Plaintiff.

4. Attached hereto as Ex. 3 is a true and correct copy of ScanSoft's Response to Defendant's First Set of Document Requests.

* * *

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

/s/ Wendy S. Plotkin

Dated: April 1, 2005